

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

LUCIAN RAY REED AND,	§	
BRENDA REED	§	
Plaintiffs,	§	
	§	
v.	§	Civil Action No. 6:15-cv-00727
	§	
ALLIED PROPERTY AND	§	
CASUALTY INSURANCE COMPANY	§	
	§	
Defendant.	§	
	§	Jury Demand

**JOINT MOTION TO REMAND/MEMORANDUM OF LAW**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, the parties, Plaintiffs, Lucian Ray Reed and Brenda Reed, and Defendant, Allied Property and Casualty Insurance Company, and by and through the undersigned counsel, and state the parties hereby agree and stipulate their desire to have this matter remanded to State Court.

The undersigned counsel for all parties have conferred and agree to the contents of this motion and respectfully request this Court grant the Joint Motion to Remand and remand this matter to State Court. It is further agreed each party shall bear their own attorney's fees and costs relating to removal and subsequent remand.

## **MEMORANDUM OF LAW**

Subsequent to the removal of this action, the parties reached an agreement on the amount of recoverable damages that would defeat diversity jurisdiction. In light of this agreement and for purposes of judicial economy, the parties have agreed to remand the case to State Court. Accordingly, all parties, by and through counsel, agree to remand of this matter to State Court with each party to bear its own fees and costs relating to removal and remand.

Respectfully submitted,

**WALTERS, BALIDO & CRAIN, L.L.P.**

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ALLIED PROPERTY & CASUALTY  
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**COUNSEL FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

This is to certify that on this the 21<sup>st</sup> day of August, 2015 a true and correct copy of the above document has been forwarded to all counsel of record in accordance with the Fed. R. Civ. P.

*Randall G. Walters*  
RANDALL G. WALTERS